

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DANIEL GOLDEN and TRACY
LOCKE,

Plaintiffs,

v.

NEW JERSEY INSTITUTE OF
TECHNOLOGY and CLARA
WILLIAMS, in her capacity as Custodian
of Records for the New Jersey Institute of
Technology,

*Defendants/Third-Party
Plaintiffs/Third-Party
Defendants,*

v.

FEDERAL BUREAU OF
INVESTIGATION,

*Third-Party Defendant/
Third-Party Plaintiff.*

HON. MADELINE C. ARLEO

Civ Action No.
2:15-cv-08559-MCA-LDW

PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES

TO:

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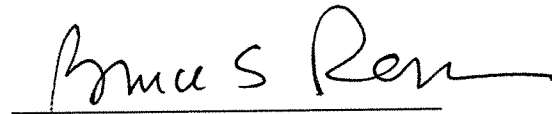
PLEASE TAKE NOTICE that in accordance with the Court's Order of October 20, 2017, ECF No. 52, Plaintiffs Daniel Golden and Tracy Locke (collectively, "Plaintiffs"), respectfully move for an award of attorneys' fees under

Section 47:1A-6 of the New Jersey Open Public Records Act, N.J.S.A. 47:1A-1, *et seq.*, from Defendants/Third-Party Plaintiffs/Third-Party Defendants the New Jersey Institute of Technology and its Custodian of Records, Clara Williams (collectively, “NJIT”), in the amount of \$189,359, at a date and time to be assigned by the Court.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon their brief, accompanied by the Declarations of Katie Townsend, Bruce S. Rosen, John C. Connell and Daniel Golden. A proposed order is also attached. Oral Argument is requested.

Dated: November 30, 2017.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bruce S. Rosen", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed with the Clerk of the Court using the ECF system, which will automatically send notification of such filing and serve counsel for the following parties

Gary Potters, Esq.

Attorney for Defendants/Third-Party Plaintiffs/Third-Party Defendants New Jersey Institute of Technology and Clara Williams

Andrew Carmichael, Esq.

Christopher Amore, Esq.

Attorneys for the Federal Bureau of Investigation

This 30th day of November, 2017.

/s/ Bruce Rosen